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Attorney for Movant, U.S. Xpress, Inc.
and Kurt Allen Updegraff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

In re SUBPOENAS TO
INFINITY CAPITAL
MANAGEMENT, LLC,

Civil Action No. 2:20-cv-01372-JCM-BNW

Alabama Case No. 7:18-cv-02129

Served in related case:

**JOINT STIPULATION
TO EXTEND THE
BRIEFING SCHEDULE BY
FOURTEEN DAYS**

*Janet Hobbs v. U.S. Xpress, Inc.
and Kurt Allen Updegraff
N.D. Ala. Case No. 7:18-cv-02129*

COME NOW Infinity Capital Management, LLC and U.S. Xpress, Inc. and Kurt Allen Updegraff (Hereinafter “Parties”) and move this Court to enter an order extending the briefing schedule by fourteen (14) days. As grounds for this Motion, the parties show as follows:

1. Movants U.S. Xpress, Inc. and Kurt Allen Updegraff filed their Motion to Compel the production of documents against Infinity Capital Management on July 24, 2020. (Doc. 1).
2. Movants served Infinity Capital Management, LLC with its Motion to Compel on July 28, 2020.
3. Counsel for the Parties have discussed the contents of the subpoena to Infinity Capital Management and Infinity Capital Management’s production.

1 4. As such, counsel for the Parties have agreed to extend the briefing schedule for
2 the Motion to Compel by fourteen (14) days in order to come to an agreement about Infinity
3 Capital Management's document production.

4 5. Neither party will be prejudiced by the extension and should the Parties come to
5 an agreement, judicial economy will be served.

6 WHEREFORE, premises considered, the Parties request that this Honorable Court extend
7 the briefing schedule by fourteen (14) days.

8
9 DATED this 31st day of July, 2020.

10 THORNDAL ARMSTRONG DELK
11 BALKENBUSH & EISINGER

12
13 s/ Phillip Goodhart

14 PHILLIP GOODHART, ESQ.

15 1100 East Bridger Avenue

16 Las Vegas, Nevada 89101

17 Attorney for the Movants

18 FREED GRANT

19 s/ Thomas C. Grant

20 THOMAS C. GRANT, ESQ.

21 101 Marietta Street, NW

22 Suite 3600

23 Atlanta, Georgia 30303

24 Attorney for Infinity Capital Management, LLC

25 **ORDER**

26 IT IS SO ORDERED this 3rd day of August, 2020.

27 

28 United States Magistrate Judge

Stefanie D. Mitchell

From: Trey Perdue <tperdue@carrallison.com>
Sent: Friday, July 31, 2020 1:11 PM
To: Philip Goodhart
Cc: Tom Oliver; Rob Arnwine; Stefanie D. Mitchell
Subject: RE: Hobbs v. US Xpress

Phil,

Tom Grant has approved us to sign for him. Thanks and have a good weekend.

Trey

From: Philip Goodhart [mailto:png@thorndal.com]
Sent: Friday, July 31, 2020 12:57 PM
To: Trey Perdue <tperdue@carrallison.com>
Cc: Tom Oliver <toliver@carrallison.com>; Rob Arnwine <rarnwine@carrallison.com>; Stefanie D. Mitchell <SDM@thorndal.com>
Subject: RE: Hobbs v. US Xpress

Thanks Trey

We will need an email from Integrity's counsel authorizing his electronic signature on the stip.

-Phil

From: Trey Perdue <tperdue@carrallison.com>
Sent: Friday, July 31, 2020 9:28 AM
To: Philip Goodhart <png@thorndal.com>
Cc: Tom Oliver <toliver@carrallison.com>; Rob Arnwine <rarnwine@carrallison.com>; Stefanie D. Mitchell <SDM@thorndal.com>
Subject: RE: Hobbs v. US Xpress

I will prepare one and send it over today.

Trey

From: Philip Goodhart [mailto:png@thorndal.com]
Sent: Friday, July 31, 2020 11:04 AM
To: Trey Perdue <tperdue@carrallison.com>
Cc: Tom Oliver <toliver@carrallison.com>; Rob Arnwine <rarnwine@carrallison.com>; Stefanie D. Mitchell <SDM@thorndal.com>
Subject: Re: Hobbs v. US Xpress

Trey - we just need to file a stipulation to extend the briefing deadline. Would you like me to prepare one? Or will you?

Philip Goodhart | Shareholder | Thorndal Armstrong Delk Balkenbush & Eisinger
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